

United States Bankruptcy Court
Eastern District of Texas
Sherman Division

In re:
Empire Countertops, LLC
1137 Enterprise Dr.
Pilot Point, TX 76258
EIN: 45-1145076

Debtor

Motion to Use Cash Collateral

Case No. 22-41686-btr

Chapter 11

**Expedited Hearing Scheduled:
Thursday, December 15, 2022 at 11:00am.**

A contested matter

EXHIBIT LIST OF EMPIRE COUNTERTOPS, LLC

Exhibit	Description of Exhibit	Offered	Objection	Admitted
1.	<i>Revised</i> 30-Day Budget (December 2022)			
2.	Emergency Expenses			
3.	List of Debtor's Balance Sheet			
4.	Projection of Revenue Over 6 Months			
5.	UCC Lien Claimants			
6.	Wells Fargo DIP Account Information			
7.	Postpetition Payroll Expenses			
8.	Any item filed of record in this proceeding			
9.	Any exhibit introduced by any other party			

WITNESS LIST

1. Curtis "Mitch" Mahoney, Debtor's Representative
2. Scott Laine, Debtor's Controller
3. Any witness called or listed on opposing counsel's list.

The Debtor reserves the right to use any exhibit introduced into evidence by any other party, to introduce and use any document that has been filed in this bankruptcy proceeding, to use any witness or exhibit not listed herein for purposes of rebuttal or impeachment, and to supplement or amend this witness and exhibit list at any time prior to the hearing.

DATED: December 14, 2022.

Respectfully submitted:

NORRED LAW, PLLC

By: /s/ Clayton L. Everett
Clayton L. Everett
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515 E. Border Street
Arlington, Texas 76010
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Proposed Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Debtor's Witness Exhibit List was served on the Office of the U.S. Trustee and upon the parties receiving notice via the Court's CM/ECF system. A copy will also be served by US Mail on the Debtor's matrix as well as the parties below:

Newtek Finance
c/o Patrick Appleton
4800 T-Rex Ave., Ste. 110
Boca Raton, FL 33431

BTH Bank / Origins
c/o Michael Slesinger
5001 El Campo Avenue
Fort Worth, TX 76107

Eagle Eye Advance LLC
254 36th Street, Ste. C303
Brooklyn, NY 11232

340 Broadway Holdings LLC
1560 Sawgrass Corp. Pkwy. Ste.474
Fort Lauderdale, FL 33323

Jeremy S. Williams
901 East Byrd Street, Suite 1000
Richmond, Virginia 23219
Via: jeremy.williams@kutakrock.com
Counsel for Eagle Eye Advance LLC

W.J. Wade, Jr.
2112 Indiana Avenue
Lubbock, TX 79410
Counsel for 340 Broadway Holdings LLC

The LCF Group, Inc.
3000 Marcus Ave. Suite 2W15
New Hyde Park, NY 11042

Merchant Advance LLC
1621 Central Avenue
Cheyenne, WY 82001

David Fogel, P.C.
1225 Franklin Avenue 522
Garden City, NY 11530
Counsel for Merchant Advance LLC

Gulf Coast Bank and Trust Company
1170 Celebration Blvd, Ste. 100
Kissimmee, FL 34747-4604

By: ___/s/ Clayton L. Everett_____